IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI

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) Case No. 2:22-cv-04027-MDH
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DISCOVERY STATUS REPORT

As required by the Court's Scheduling and Trial Order for Bench Trial (Doc. No. 80), the United States, Aric Schreiner, and Columbia CPA Group, LLC jointly provide the following status report¹:

By the United States

Since filing the prior Discovery Status Reports in this action (Doc. Nos. 91, 111, and 136), the United States reports that it has taken a number of depositions and served a privilege log as identified below:

¹ The Court entered injunctions and judgments resolving the United States' claims in this action against Defendants John Eickhoff, Jr., Hoffman Associates, LLC, Rhonda Eickhoff, Damon Eisma, and John Gray, II.

	Description	Date	Status
83	Deposition of Donald Furrer (non-party)	6/2/23	Completed
84	Deposition of Tim Gerhardt (non-party)	6/2/23	Completed
85	Deposition of Richard Rodgers (non-party)	6/7/23	Completed
86	Deposition of David Moore (non-party)	6/8/23	Completed
87	Deposition of Dick Gerhardt (non-party)	6/14/23	Completed
88	U.S. Privilege Log	6/15/23	Completed

The United States further reports that it intends to take the following depositions in September and October 2023:

- (a) John Gray II (September 14, 2023);
- (b) Rhonda Eickhoff (September 20, 2023);
- (c) Damon Eisma (September 25, 2023);
- (d) John Eickhoff, Jr. (September 27, 2023);
- (e) Hoffman Associates LLC (September 27, 2023); and
- (f) Aric Schreiner (October 6, 2023).

The United States also may take discovery of additional non-parties and serve written discovery on Defendants.

The United States reports that there are currently no discovery disputes among the parties.

By Aric Schreiner and Columbia CPA Group

Aric Schreiner and Columbia CPA Group have propounded discovery requests and received timely responses to interrogatories and requests for production from the United States. Schreiner and Columbia intend to notice and take depositions of IRS employees and other relevant fact witnesses in the coming months.

Schreiner and Columbia agree with the United States that there are currently no discovery disputes among the parties.

Dated: September 4, 2023. Respectfully submitted,

> TERESA A. MOORE **United States Attorney**

DAVID A. HUBBERT Deputy Assistant Attorney General

/s/ Russell J. Edelstein

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Dated: September 1, 2023.

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